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August 19, 2019

VIA ECF and Priority Mail Express

Honorable David F. Hurd, U.S. District Judge
Alexander Pirnie Federal Bldg. and U.S. Courthouse
10 Broad Street
Utica, NY 13501

Honorable Christian F. Hummel, U.S. Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: *New York Immigration Coalition, et al. vs. Rensselaer County
Board of Elections, et al., No. 19-CV-920 (DNH) (CFH)*

Dear Judge Hurd and Judge Hummel,

Pursuant to Local Rule 7.1(b)(2), Plaintiffs write to request leave of Court to file a Motion for a Preliminary Injunction, or, in the alternative, a court conference to obtain permission to file such a Motion. Defendants do not take any position regarding Plaintiffs' request for leave to file a Motion for a Preliminary Injunction. Plaintiffs also request that they be afforded the opportunity to file a reply brief in connection with their proposed Motion. Defendants do not wish to take a position on this request until they have reviewed Plaintiffs' initial filing.

On August 15th and 19th, Plaintiffs conferred with Defendants in a good faith effort to resolve this matter. *See* L.R. 7.1(b)(2). At this time, the parties are unable to reach a mutually satisfactory resolution. Accordingly, Plaintiffs respectfully request leave of Court to file a Motion for a Preliminary Injunction and the opportunity to file a reply brief in connection with

that Motion. Should the Court find these requests acceptable, Plaintiffs have provided a line to “So Order” this letter. In the alternative, Plaintiffs request a court conference to discuss these matters at the Court’s earliest convenience.

Thank you very much for your attention and consideration.

Respectfully Submitted,

/s/ Benjamin L. Berwick

Benjamin L. Berwick

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cc: All counsel (via ECF and Priority Mail Express)

SO ORDERED:

Hon. David N. Hurd

Hon. Christian F. Hummel